

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**RICHARD IRVING BECKMAN AND )  
KARI ANN BECKMAN, )  
Plaintiffs, )  
v. )  
REGINA CAELI, INC. a/k/a )  
REGINA CAELI ACADEMY, )  
Defendant. )**

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**CIVIL ACTION FILE NO.  
2:23-CV-00034**

**PLAINTIFFS' MOTION FOR LEAVE TO FILE THIRD AMENDED  
COMPLAINT**

**COME NOW, RICHARD IRVING BECKMAN ("Rich") and KARI ANN BECKMAN ("Kari") (collectively, the "Beckmans" and "Plaintiffs"), and respectfully move this Court for leave to file the Third Amended Complaint, attached hereto as Exhibit A, pursuant to Federal Rule of Civil Procedure 15(a)(2).**

For the reasons set forth in the accompanying Memorandum in Support of Plaintiffs' Motion for Leave to File Third Amended Complaint, Plaintiffs respectfully request that the Court grant leave to file the Third Amended Complaint, as it will clarify the issues in dispute and will not result in any undue prejudice to Defendant Regina Caeli Academy.

This 18th day of June, 2025,

Respectfully submitted,

**HASSON LAW GROUP, LLP**

*/s/Keith S. Hasson*

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Keith S. Hasson  
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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1(C)**

I hereby certify that the foregoing has been prepared in 14-point Times New Roman font, as required by Local Rule 5.1(C) for the Northern District of Georgia. The foregoing has also been prepared in compliance with the margin specifications of such Rules.

Respectfully submitted, this 18th day of June, 2025.

Respectfully submitted,

**HASSON LAW GROUP, LLP**

/s/Keith S. Hasson

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2025, I electronically filed the within and foregoing **PLAINTIFFS' MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT** with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to the following counsel of record:

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This 18th day of June, 2025.

**HASSON LAW GROUP, LLP**

*/s/Keith S. Hasson*  
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